

# EXHIBIT D

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**COMPARISON OF THE AMENDED COMPLAINT'S ALLEGATIONS ABOUT DEFENDANT**  
**TO OTHER STATEMENTS BY PLAINTIFF JENNIFER HOUGH**

<b>Allegations in Amended Complaint</b>	<b>March 4, 2021 Daily Beast Article</b>
"Plaintiff's 'friend' brought her home from the hospital.... Hours after being violently raped, <b>Plaintiff's friend</b> said, 'I am sorry you got raped, but you should have screamed.'" (Para. 62)	"A close friend ... brought her back to her home. When she returned to the house and told <b>her adoptive mother</b> what happened, Jennifer said, she was simply told, 'Sorry you got raped, but you should have screamed.'" (p. 2)
"In a clueless delusional rant, the parents of Petty stated that Plaintiff was only accusing Petty of rape out of anger. Pettys' parents claimed that Petty no longer wanted to date Plaintiff." (Para. 64)	"Petty's parents, Jennifer added, responded to his arrest by telling her adoptive family that the two had been dating." (p. 4).
"Plaintiff was constantly beaten and verbally abused in the street and her home because everyone wanted her to drop the charges against Petty." (Para. 70)	No mention of any beatings.
In her initial conversation with Black, "the topic of Plaintiff's rape came up, to which Plaintiff stated, 'she wished it could all just go away forever.' Black responded, 'I can make that happen.'" (Para. 88)	"Jennifer didn't think much of it at first when Barry mentioned Minaj and Petty, or even when he offered to make the fuss around the court case 'go away.'" (p. 6)
"A few days after Defendant Minaj called Plaintiff, Plaintiff's brother called her. He stated two people reached out to a family member stating there is an offer of \$500,000.00 from Defendant Minaj if Plaintiff wrote a letter recanting her rape claim against Petty." (Para. 93)	Jennifer's brother "called within days of her conversation with Minaj to tell her that a man named Jamie from New York had called their cousin in North Carolina, offering \$500,000 if Jennifer spoke with a lawyer representing Petty. She never called the lawyer." (p. 7)
"Plaintiff hung up, distraught that Defendant Minaj's instructed her associates to contact her brother, and her brother would even relay such a message.  This act by Defendant Minaj and her associates caused Plaintiff to panic because Black, who was in contact with Defendant Minaj, now knew where Plaintiff lived, where Plaintiff worked, and the identity of Plaintiff's kids." (Paras. 93-94)	"When asked about the offer, Barry allegedly denied that the money could have come from Minaj or Petty. Jennifer recalled him insisting that Petty had no money, and Minaj wouldn't give Petty the money either. 'So I was confused as to how all of this was happening around me,' she said. 'I'm like, 'You say Nicki's not involved, but she's the one who called me.'" (p. 7)
"Black continues to receive and relay messages from the Defendants to Plaintiff. For a while, Plaintiff ignored Black's calls. Plaintiff finally answered, and he tells her that he had good news. Black stated that nothing would happen to Plaintiff if she signed and notarized some papers in his possession." (Para. 100)	No mention of these alleged messaged from Defendants.
Concerning the \$20,000 offered her to by Black, " <b>Plaintiff could not believe that Defendant Minaj would go this far to bribe her.</b> " (Para. 102)	When Black offered the \$20,000 to Plaintiff, he "told her he'd recoup his money on the back end." (p. 7)
At the time he offered Plaintiff the \$20,000, "Black even said that Defendant Minaj would also send happy birthday videos to Plaintiff's daughter for her birthday as a bonus." (Para. 103)	Black "wanted the rapper [(Defendant)] to appear at his daughter's 16th birthday party." (p. 9)

<b>Allegations in Amended Complaint</b>	<b>March 4, 2021 Daily Beast Article</b>
<p>"At the end of May 2020, Plaintiff received a call from her brother where he was speaking frantically. The brother stated that they know where she lived, what her daughter does, and threatened to have someone else show up at the Plaintiff's house if she did not recant her 1994 rape claim." (Para. 105)</p>	<p>"In the beginning of June, Jennifer became even more fearful when she received a call from her brother asking if she was OK. He told her that their cousin had called him again, and that this time he'd sounded terrified, telling him that 'they' knew where she lived. (Jennifer assumed he was referring to, as she'd been told, the 'OG's from the neighborhood' working for Petty.) 'Don't be surprised if they're sitting on your couch,' he allegedly said." (pp. 7-8)</p>
<p>Not mentioned in the Amended Complaint.</p>	<p>"As for why Jennifer's brother ... [was] so invested in Minaj and Petty's legal affairs? [...] Her brother and cousin, meanwhile, allegedly wanted Minaj to do a walkthrough promotion at a club so they could split the profit." (p. 9)</p>
<p>"Three days after moving in August 2020, the U.S. Marshals showed up at the Plaintiff's husband's job. She called the U.S. Marshals, and they stated that someone had called them to report that Plaintiff was being harassed and they were worried about her safety. The Marshals offered Plaintiff witness protection. The Marshals also confirmed with Plaintiff that the call she received from California was indeed Defendant Minaj." (Paras. 108-09)</p>	<p>"In late August, Jennifer moved to another home in Georgia after lawyers working for Petty called a phone number she'd registered under an assumed name. Days after she'd moved in, the U.S. Marshals showed up at her then-husband's job and told him they needed to speak with her. (The two have since separated.) When the Marshals arrived at her home, Jennifer began to panic; they said they'd been informed she was being harassed to recant, but she had no idea how they'd gotten involved. She even texted Minaj, in the hopes that she could find out what was going on." (p. 8)</p>
<p>"In September 2020, while visiting her brother in South Carolina, Plaintiff is once again harassed. Plaintiff gets a call from a New York Attorney stating that they represent Petty. The attorney states they were trying to go to Court to get Petty off the sex offenders registry and asked about the recantment letter and if Plaintiff wrote it." (Paras. 110-11)</p>	<p>No mention of this call.</p>
<p>Not mentioned in the Amended Complaint.</p>	<p>"I didn't know if she was trying to help me out; I didn't know if she was trying to set me up,' Jennifer said. 'I didn't know if the people around me [were] trying to set me up.'" (p. 9)</p>
<p>"In October of 2020, Plaintiff's daughter was at an event in Atlanta, Georgia. At the end of the night, Plaintiff's daughter and her friend group were approached by a man. The man asked 'do you know Zoo?' (Zoo is Petty's street name). Plaintiff's daughter yelled at the man and left with her friends." (Para. 112)</p>	<p>"The last time Jennifer moved was in October--after an older man approached her 22-year-old daughter, Kenya, in a club. In a Facebook video, Kenya says that man insisted she looked familiar and listed off her relatives after she shared that she was from South Jamaica, Queens. ('He named my mother,' she said. 'He named all her fucking brothers.') Then he asked if she knew Kenneth Petty." (p. 10).</p>